

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SHEINDLE SOFER,

Plaintiff,

V.

Civil Action No. 1:23-cv-04844-DLI-JAM

TRANSUNION, LLC; EQUIFAX
INFORMATION SERVICES, LLC;
EXPERIAN INFORMATION
SOLUTIONS, INC.; SYNCHRONY
BANK;

Defendants.

NOTICE OF EXPERIAN INFORMATION SOLUTIONS, INC.'S
MOTION FOR SANCTIONS

PLEASE TAKE NOTICE that, upon the points and authorities set forth in the accompanying Memorandum of Law in Support of Experian Information Solutions, Inc.’s (“Experian”) Motion for Sanctions, the Declaration of Kerianne Tobitsch, the Declaration of Carol Franz, the Declaration of Sean Cahan, and the Declaration of Yenon Argy, Experian moves this Court, before the Honorable Dora Lizette Irizarry, United States Courthouse for the Eastern District of New York, 225 Cadman Plaza East, Brooklyn, New York 11201, for an order, pursuant to Fed. R. Civ. P. 11(c)(3), Fed. R. Civ. P. 26, 15 U.S.C. § 1681n(c), 28 U.S.C. § 1927, and the Court’s inherent powers, imposing sanctions against Stein Saks PLLC, its partners, and Tamir Saland.

Dated: New York, New York
April 24, 2024

JONES DAY

/s/ Kerianne Tobitsch

Kerianne Tobitsch
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*Attorneys for Experian Information
Solutions, Inc.*

CERTIFICATE OF SERVICE

I, Kerianne Tobitsch, certify that on April 24, 2024, I caused the foregoing to be filed with the Clerk of the Court and served upon all counsel of record via ECF.

/s/ Kerianne Tobitsch

Kerianne Tobitsch

*Attorneys for Defendant
Experian Information Solutions, Inc.*